

The health and safety of the residents in the USA are the fundamental concern of the government;

Taking into evidence that:

A substantial number of peer-reviewed scientific studies, over several decades, as well as many recent studies, have shown significant human and environmental health impacts;

and

In May 2011, the World Health Organization declared this radiation to be a possible carcinogen, Class 2B -- in the same category as lead and DDT.

http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208_E.pdf; and

The Government of India, Ministry of Environment and Forests (2011),

After reviewing the literature including 919 studies, concluded:

The adverse effects of electromagnetic radiation from mobile phones and communication towers on health of human beings are well documented today."

Report on Possible Impacts of Communication Towers on Wildlife including Birds and Bees, October 2011

http://moef.nic.in/downloads/public-information/final_mobile_towers_report.pdf; and

FCC guidelines have not been protective of the general population, and have only concerned thermal (heating) short-term and one-time exposure to a large man. Norbert Hankin of the U.S. Environmental Protection Agency (EPA) wrote in 2002

"The FCC's current exposure guidelines, as well as those of the Institute of Electrical and Electronics Engineers (IEEE) and the International Commission on Non-ionizing Radiation Protection (ICNIRP), are thermally based, and do not apply to chronic, nonthermal exposure situations. They are believed to protect against injury that . . . result(s) in tissue heating or electric shock and burn. . . The FCC's exposure guideline is considered protective of effects arising from a thermal mechanism .. the generalization by many that the guidelines protect human beings from harm by any and all mechanisms is not justified."

http://www.emrpolicy.org/litigation/case_law/docs/noi_epa_response.pdf;

and

After a review of literature, Santa Cruz County Health Officer Dr. Poki Namkung wrote in her report Health Risks Associated with Smart Meters (January 13, 2012):

"There are no current, relevant public safety standards for pulsed RF involving chronic exposure of the public, nor of sensitive populations, nor of people with metal and medical implants that can be affected by localized heating and by electromagnetic interference..."

[http://sccounty01.co.santa-](http://sccounty01.co.santa-cruz.ca.us/bds/Govstream/BDSvData/non_legacy/agendas/2012/20120124/PDF/041.pdf)

[cruz.ca.us/bds/Govstream/BDSvData/non_legacy/agendas/2012/20120124/PDF/041.pdf](http://sccounty01.co.santa-cruz.ca.us/bds/Govstream/BDSvData/non_legacy/agendas/2012/20120124/PDF/041.pdf); and

The American Academy of Environmental Medicine stated to the California Public Utilities Commission (January 2012):

"Chronic exposure to wireless radiofrequency radiation is a preventable environmental hazard that is sufficiently well-documented to warrant immediate preventative public health action."

<http://aaemonline.org/images/CaliforniaPublicUtilitiesCommission.pdf>;

and

The Austrian Medical Association's report Guideline of the Austrian Medical Association for the diagnosis and treatment of EMF-related health problems and illnesses (EMF syndrome) (March 3, 2012) set preliminary benchmarks for "normal" RF exposure at .0001 microW/cm² -- ten million times lower than FCC guidelines

<http://www.aerztekammer.at/documents/10618/976981/EMF-Guideline.pdf>; and

The FCC's exposure guidelines are substantially less protective than the standards of many of the individual nations within Europe, Asia, and other regions of the world;

And, the FCC is obliged to conduct periodic reviews of current research and analysis of the health implications associated with radio-frequency exposures in cooperation with industry, agency, and organizations responsible for community health and safety to ensure exposure guidelines are appropriate and scientifically valid; and

The FCC has failed to do so until this current proceeding;

I oppose any further delay in assessing and establishing biologically-based national RF standards that take into consideration vulnerable populations including children, elderly, electrosensitive, immune suppressed and compromised, and those with medical implants and metal implants; Local planning agencies should have the authority to regulate the placement, construction, and modification of telecommunications towers and other personal wireless services facilities, and such agencies should be positioned to do so based on the most protective standards and guidelines that address the health impacts of this infrastructure.

THEREFORE, I recommend the following five health promoting improvements for the FCC to begin implementing as soon as possible:

1) Hold Public evidentiary hearings on RF health and environmental impacts, to receive testimony from

A -- The public.

B -- Public health authorities with expertise in this area without conflicts of interest with industry, and

C -- Public health advocacy organizations, including EMR Policy Institute, Cellular Phone Task Force, Citizens for Safe Technology, EMF Safety Network, Stop Smart Meters, and the Center for

Electrosmog Prevention

D -- A working group panel of health experts who have no conflicts of interest with industry to review the scientific literature on EMR/RF and recommend biologically-based EMR standards that ensure adequate protection for the general public and occupational health based upon the precautionary principle.

The FCC should take the testimony from the hearings and the recommendations of the working group panel together to adopt standards, testing procedures, and appropriate precautionary warning language.

2) The FCC should not take any actions that may increase exposure of the population to EMR from cell phones, base stations, Wi-Fi, Smart Meters and other RF- or ELF-emitting devices.

3) The FCC must especially protect vulnerable groups in the population including children and teenagers, pregnant women, men of reproductive age, individuals with compromised immune systems, seniors, and workers.

The FCC must re-evaluate and update these standards a minimum of every two years.

4) The FCC must also promptly pursue a comprehensive global analysis of best practices and scientific evidence in order to update their existing standards on an ongoing basis and to adequately measure the health impacts of telecommunications towers and wireless technology, similar to the bill introduced by former Congressman Dennis Kucinich last year (HR 6358).

5) Furthermore, the FCC should immediately and actively encourage, support and promote legislation repealing any and all limitations on state and local authority imposed by the Telecommunications Act of 1996 and subsequent laws, including Section 704 of the 1996 Telecom Act and Section 332 (c) (7), because they infringe upon the authority of local governments to regulate the placement, construction, and modification of telecommunications towers and other personal wireless services facilities on the basis of the health and environmental effects of these facilities.

Lets adequately protect the people of the USA with up to date EMF safety standards. Therefore we will have a stronger nation.

Thank you for your time and consideration.

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